

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

YOON DOELGER, and
PETER DOELGER,

Plaintiffs,

vs.

JPMORGAN CHASE BANK, N.A., and
CHICKASAW CAPITAL MANAGEMENT,
LLC,

Defendants.

No. 1:21-cv-11042-AK

**THE PARTIES' JOINT STATEMENT REGARDING THE EXHIBITS
FILED IN CONNECTION WITH PLAINTIFFS' OPPOSITION TO
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Defendants JPMorgan Chase Bank, N.A. ("JPMC") and Chickasaw Capital Management, LLC ("Chickasaw") (collectively, "Defendants") and Plaintiffs Yoon and Peter Doelger ("Plaintiffs," and together with Defendants, "the Parties") respectfully submit this joint statement regarding the unsealing, or replacing with redacted versions of, certain exhibits filed in connection with Plaintiffs' opposition to Defendants' motion for summary judgment (Doc. No. 300) pursuant to the Court's January 12, 2024 order (Doc. No. 363).¹

The parties have met and conferred and agreed that the exhibits identified herewith in Exhibit A may be unsealed on the public docket and the exhibits identified in Exhibit B may be replaced with redacted versions on the public docket.² For the Court's convenience, Exhibit C

¹ The Parties are conferring separately regarding challenges by Plaintiffs to the sealing of Defendants' summary judgment exhibits; we will update the Court promptly regarding any agreed-upon changes to the sealing of Defendants' exhibits and whether any disputes will require motion practice to be resolved.

² Plaintiffs will send the Court, via Federal Express mail, a CD-ROM containing all summary judgment opposition exhibits to be filed on the public docket, including the substantively redacted versions of all exhibits listed in Exhibit

contains a list of all Plaintiffs' summary judgment opposition exhibits and their agreed, or ruled upon, sealing or redaction status.

WHEREFORE, the Parties respectfully request that this Court unseal the exhibits identified in Exhibit A, and replace with redacted versions the exhibits identified in Exhibit B.

CERTIFICATE OF CONFERRAL

Counsel for Defendants hereby certify that the Parties conferred on January 18 and 19, 2024 and agreed to submit this joint statement.

Dated: January 19, 2024

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/s/ William H. LaGrange

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B, as well as all exhibits listed in Exhibit A, some of which will contain previously unapplied redactions of immaterial personal identifying information as required by Fed R Civ P 5.2.

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CERTIFICATE OF SERVICE

I, William H. LaGrange, hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing on January 19, 2024, and that paper copies will be sent to those indicated as non-registered participants on January 19, 2024.

/s/ William H. LaGrange

William H. LaGrange